

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HALLMARK LICENSING, LLC,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 24-cv-11002

Judge Matthew F. Kennelly

Magistrate Judge Beth W. Jantz

RESPONSE TO MINUTE ORDER [32]

Plaintiff Hallmark Licensing, LLC (“Plaintiff”) submits this response and moves this Honorable Court for reconsideration of the Court’s November 23, 2024, Minute Order [32] (the “Order”) denying Plaintiff’s Motion for Entry of Preliminary Injunction [28] without prejudice. [32]. However, Plaintiff respectfully requests that the Temporary Restraining Order [20] be extended to allow additional time before a hearing on Plaintiff’s Motion for Entry of a Preliminary Injunction.

The Temporary Restraining Order [20] (“TRO”) directed that the Third Party Providers respond within seven (7) calendar days of receipt of the TRO. [20] at ¶ 5. The Third Party Providers typically take all seven (7) calendar days (or more) to confirm that the TRO has been effectuated and provide defendants’ e-mail addresses. Because all of the Third Party Platforms had not fully effectuated the TRO by the initial November 12, 2024, deadline to file a motion for preliminary injunction or motion to extend the TRO, Plaintiff requested that it be extended through November 27, 2024. [26]. The Court extended the TRO and set a deadline to file any motion for

preliminary injunction for November 22, 2024, and a corresponding hearing for November 27, 2024. *Id.*

The Third Party Platforms provided Plaintiff with the e-mail addresses of the Defendants pursuant to the TRO on the following dates: November 8, 2024 (Defendant Nos. 46-49), November 11, 2024 (Defendant Nos. 53-81), November 12, 2024 (Defendant Nos. 16-45 and 50-52), November 14, 2024 (Defendant No. 82), November 18, 2024 (Defendant Nos. 1-9) and November 21, 2024 (Defendant Nos. 10-15). Plaintiff served Defendants promptly upon receipt of contact information for all Defendants. Plaintiff filed and provided notice of Plaintiff's Motion for Entry of Preliminary Injunction [28] to Defendants on November 22, 2024. Plaintiff served Defendants the same day. [31].

Accordingly, Plaintiff respectfully requests that the Court reconsider the Order [32], extend the TRO until there is a ruling on Plaintiff's Motion for Entry of Preliminary Injunction [28] and grant Plaintiff's Motion for Entry of Preliminary Injunction [28]. Plaintiff respectfully submits that there is good cause to extend the TRO to allow additional time for Defendants to respond to Plaintiff's Motion, since Plaintiff received all of Defendants' e-mail addresses from the Third Party Providers on November 21, 2024 and Plaintiff provided notice on November 22, 2024. *See H-D Mich., LLC v. Hellenic Duty Free Shops S.A.*, 694 F.3d 827, 843-45 (7th Cir. 2012). Additionally, there is a high probability that the Defendants will continue to harm Plaintiff without the TRO in place, especially since Defendants now have notice of this case.

Dated this 25th day of November 2024.

Respectfully submitted,

/s/ Rachel S. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of November 2024, I will electronically publish the document on a website and I will send an e-mail to the e-mail addresses identified in Exhibit A to the Summons that includes a link to said website.

/s/ Rachel S. Miller
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